

## REMARKS

Claims 1 – 20, 22, and 24 are in the application. Claims 1, 22, and 24 were are currently amended; claims; claims 2 – 20 remain unchanged from the original versions thereof; and claims 21 and 23 are canceled. Claims 1, 22, and 24 are the independent claims herein. No new matter has been added to the application as a result of the amendments submitted herewith.

Reconsideration and further examination are respectfully requested.

### **Claim Rejections – 35 USC § 103**

Claims 1 – 20 and 22 were rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis U.S. Patent No. 6,513,019 in view of Borkovsky U.S. Patent No. 6,556,991 B1 in view of Tan, Victor S. L. Tan "Early Warning System Important." New Straits Times. Kuala Lumpur: Apr 22, 1998. pg 12 (hereinafter, Tan). This rejection is respectfully traversed.

Clearly Applicant claims a method wherein the mapping of the at least one product identifier to a standardized product identifier is accomplished by associating product nomenclature from each of the plurality of operating units with product nomenclature of the entity, the mapping of the at least one collateral identifier to a standardized collateral identifier is accomplished by associating collateral nomenclature from each of the plurality of operating units with collateral nomenclature of the entity; and the generated aggregated exposure information for the entity is related to the at least one customer to indicate a financial exposure of the entity as related to said at least one customer across the plurality of operating units. Claims 22 and 24 are worded, in relevant part, similar to claim 1.

Contrary to the Applicant's claims 1, 22, and 24, the cited and relied upon Borkovsky discloses a method for normalizing names and descriptions of items. According to Borkovsky, item name variants are grouped together to form clusters and

each cluster of item name variants is mapped to a normalized item name. (See Borkovsky)

Applicant respectfully notes that Borkovsky does not disclose or suggest that the clusters, normalized names, or variant names therein are associated with or related to a plurality of operating units of an entity. That is, Borkovsky makes no distinction of the source of the item names forming a cluster of variant names. Borkovsky merely discloses the variant names being provided or obtained from "item name sources 202a-n". (See Borkovsky, col. 3, ln. 60 – col. 4, ln. 27). The sources of the names in Borkovsky are not associated with operational units (or the equivalents thereof) of a business entity. Furthermore, the item name sources in Borkovsky appear to have no significance nor does Borkovsky make a distinction regarding the item name source such as, for example, gathering item names from one or more operational units of an entity. Instead, Borkovsky merely discloses the mapping of variant names to a normalized name. No distinction or suggestion is provided regarding an association of a name variant to an operational unit and a normalized name for an item associated with the entity comprising the operating unit. Further, no disclosure is provided of a relationship between the item name sources and the source of the normalized name.

Applicant's claims however are clear in distinguishing that the claimed entity comprises the claimed plurality of operational units and that the product identifier and the collateral identifier are associated with the entity by each of the product identifier and the collateral identifier being "of the entity unit".

Therefore, the Office Action's statement that Borkovsky discloses mapping said product identifier to a standardized product identifier by associating product nomenclature from each of the plurality of operating units with product nomenclature of the entity is false. Again, Borkovsky neither discloses nor suggests mapping a product nomenclature for each of a plurality of operating units with a standard product nomenclature of an entity, where the entity includes the plurality of operating units.

Applicant notes that the mapping of the product identifiers by associating product nomenclature from each of the plurality operating units with product nomenclature of the entity offers substantial benefits such as, for example, allowing exposure information to be tracked and analyzed at a product level (See the Specification, paragraph 18). Accordingly, the claimed aspects of the operating units and the nomenclature of the entity deserve every consideration when determining the patentability of the claims.

Therefore, the cited and Borkovsky does not disclose that for which it is cited and relied upon and, more importantly, that which is claimed by Applicant. Combining Borkovsky and Lewis therefore does not correct the deficiencies of Lewis since Borkovsky fails to disclose that for which it was cited and relied upon for disclosing.

Applicant further submits that combining the cited and relied upon Lewis, Borkovsky, and Tan as alleged in the Office Action fails to correct the deficiencies of Lewis since Borkovsky (at least) fails to disclose that for which it was cited and relied. Furthermore, the deficiencies of Borkovsky are not corrected by the disclosure of Lewis and Tan.

Therefore, Applicant respectfully submits that claims 1 and 22 are not anticipated by Lewis, Borkovsky, and Tan under 35 USC 103(a). Claims 2 – 20 and 22 depend from claim 1. Applicant submits that claims 2 – 20 and 22 depending from claim 1 are patentable over Lewis, Borkovsky, and Tan for at least depending from an allowable base claim.

Accordingly, the reconsideration and withdrawal of the rejection of claims 1 – 20 and 22 under 35 USC 103(a) are respectfully requested, as well as the allowance of same.

Claim 24 was rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis in view of Borkovsky. This claim is respectfully traversed.

Inasmuch as the claims 1 – 20 and 24 discussed hereinabove are clearly shown to claim that which is not disclosed or suggested by the combination of Lewis and

Borkovsky, Applicant respectfully submits that Lewis fails to disclose, at least, the mapping aspects of claim 24.

Accordingly, the reconsideration and withdrawal of the rejection of claim 24 under 35 USC 103(a) is respectfully requested, as well as the allowance of same.

### CONCLUSION

Accordingly, Applicants respectfully request allowance of the pending claims. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-5985.

Respectfully submitted,

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Date

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